John H. Culver, III

Hearst Tower 47<sup>th</sup> Floor 214 W.. Trade Street Charlotte, NC 28202

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Riki Paul Johnson 404 Navesink Avenue Atlantic Highlands, NJ 07716 (662)-701-0582 BohdiWest@gmail.com Clerk, US District Court Western District of NC

RE: Case Number 3:18-cv-565

Johnson V Fliehr, Fliehr, WWE, Brian Shields and those yet to be determined

Mr. Culver,

In lieu of a formal Preservation of Evidence letter due to time constraints and my current self-representation, I would like to bring to the attention of your client, World Wrestling Entertainment, in accordance with the Federal Rules of Evidence their duty and the duty of their officers and representatives to preserve any and all evidence that may be subject to discovery in the above referenced case. This evidence includes but is certainly not limited to corporate emails, contracts, inter-company communication, text messages, phone records, contracts, postings on any internet medium or platform of social media. Also in consideration are all forms of communication and its content between WWE, Ashley Elizabeth Fliehr, Richard Morgan Fliehr, Brian Shields, St. Martin's press, Melinda Zannoni, Esq. of Legacy Talent in Charlotte, North Carolina and those other individuals or companies involved in the publication and/or distribution of the book "Second Nature," and any officers, managers or representatives thereof. I am also of the understanding that there are tangible, hard copy journals used to create and in the publication of this novel. Those documents should be preserved as well. I would also encourage your client to error on the side of caution if and when they question whether or not content is classified as discoverable and leave same intact and unaltered.

I appreciate your time and attention to this very important matter. Please accept this in the interim until I am able to complete a more formal notice for the preservation of evidence in this case. Thank you.

Sincerely

Riki Paul Johnson Plaintiff, Pro Se

Cc: Western District Clerk of Court, via USPS

## **CERTIFICATE OF SERVICE**

I, Riki Paul Johnson, Plaintiff *Pro Se*, hereby certify that on November 1<sup>st</sup>, 2018, I served true and correct copies of letters regarding the preservation of evidence via U.S. First Class, postage prepaid, upon the following:

## John H. Culver

Attorney for Defendant World Wrestling Entertainment Hearst Tower 47<sup>th</sup> Floor 214 North Tryon Street Charlotte, NC 28202

## Jonathan Buchan

Attorney for Defendants A. Fliehr, R. Fliehr & Brian Shields 1701 South Boulevard Charlotte, NC 28203

Riki Paul Johnson

Plaintiff, Pro Se

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case 3:18-cv-00565